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December 16, 2002

Winston Hickox, Agency Secretary
California Environmental Protection Agency
1001 I Street
Sacramento, CA

RE: Electronic Waste Forum (November 25, 2002)

Dear Secretary Hickox:

On behalf of its 29 member counties, the Regional Council of Rural Counties (RCRC) would like to express our appreciation to you for the opportunity to have participated in the recent Electronic Waste Forum as a representative of local government. The various panel presentations were informative and the follow-up interactions between the moderators and panelists were particularly beneficial.

As highlighted in RCRC's presentation at the Forum, the rural counties of California are interested in working closely with Cal EPA, the State Legislature, environmental groups, and other stakeholders to be a meaningful participant in helping to craft a solution to the growing "e-waste problem". RCRC would like to work with you and others to be sure that any forthcoming legislative and regulatory proposals effectively meet the needs of all Californians by providing necessary support to local jurisdictions.

I have attached hereto a copy of the outline that was the basis for RCRC's presentation at the recent Forum. This outline highlights some of the opportunities and some of the challenges facing rural counties when it comes to effectively managing electronic waste in a responsible manner that protects the environment while providing the needed services to residents in our rural communities.

Our biggest challenge will be to develop and maintain reasonably convenient and cost-effective collection programs for "e-waste" generators. At the Forum, some industry representatives expressed willingness to assume financial responsibility for electronic waste recycling after the discarded equipment is consolidated at centrally located collection areas. While this may be helpful, it addresses only one aspect of the much larger issue. The most significant waste management costs for discarded electronic equipment, at least in the rural areas of California, are incurred prior to material consolidation. These costs are associated with the collection/receipt of materials from individual users and include on-site material processing, equipment sorting, packaging, storage, and eventual transport to a designated centralized location—a location that

will quite likely be distant from the rural county wherein the waste was generated. RCRC is hopeful that funding support for these costs will be meaningfully addressed in the months ahead.

Again, thank you for soliciting and considering input from the rural jurisdictions in California. If you have any questions at this time about our presentation or about any of the “bullet points” in the attached outline, please feel free to contact me.

As follow-up to the Forum proceedings, RCRC is pleased to offer our continuing support to help develop workable solutions to this challenging “e-waste” problem. It is increasingly evident to our member counties that an effective and cooperative relationship between local and State government will provide the framework for development and maintenance of successful e-waste management programs that will be available to residents and businesses throughout all regions of California.

Sincerely yours,

/s/

James A. Hemminger, P.E.
Regional Council of Rural Counties
Vice President for Regulatory Affairs

attach: RCRC Presentation Outline